

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

KAY REDDIT, *individually and as the Personal*)
Representative of Thomas M. Lodahl,)

Plaintiffs,)

v.)

Civil Action No. 2:12cv521

LAW OFFICES OF SHAPIRO, BROWN &)
ALT, LLP, *et al.*,)

Defendants.)

DECLARATION OF KRISTI C. KELLY

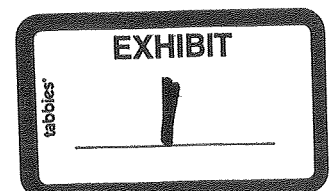
I, Kristi C. Kelly declare:

1. My name is Kristi C. Kelly. I am over 21 years of age, of sound mind, capable of executing this declaration, and have personal knowledge of the facts stated herein, and they are all true and correct.

2. I am one of the attorneys working on behalf of the Plaintiff in the above styled litigation, and I am an attorney and a partner of Surovell, Isaacs, Petersen & Levy, PLC a nineteen attorney law firm with offices in Fairfax, Virginia. My primary office is 4010 University Drive, Suite 200, Fairfax, Virginia 22030.

3. Since 2006, I have been and presently am a member in good standing of the Bar of the highest court of the State of Virginia, where I regularly practice law. Since 2007, I have been and presently am a member in good standing of the Bar of the highest court of the District of Columbia.

4. Since 2009, my practice has been limited to consumer protection litigation. While



my experience representing consumers has come within several areas, my most developed area of expertise is in plaintiffs litigation under the Federal Consumer Credit Protection Act, 15 U.S.C. § 1601, et seq., and in particular the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq., the Equal Credit Opportunity Act, 15 U.S.C. § 1691, et seq., and the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq.

5. I have experience in complex litigation, including class action cases, prosecuted under the Consumer Credit Protection Statutes, including the Fair Credit Reporting Act, the Equal Credit Opportunity Act, and the Fair Debt Collection Practices Act.

6. In each of the class cases where I have represented Plaintiffs in a consumer protection case, including cases such as the instant case, the Court found me to be adequate class counsel and has approved my requests for fees and costs.

7. I have taught Continuing Legal Education (CLE) programs for other attorneys in the areas of Consumer Law, Mortgage Litigation and Landlord and Tenant Issues.

8. My law firm uses STI/TABS billing software to contemporaneous record our time expended and costs advanced in client matters. A true and accurate copy of a print out of our billing statement is attached at Exhibit A to this Declaration.

9. As of April 24, 2013, my law firm has advanced \$12.17 in costs for the prosecution of this action. My law firm generally does not charge costs to the client for legal research charges, regular postage or copies.

10. My standard hourly rate is \$300.00 per hour. This is the rate I charge most clients for representation in litigation matters and it is included in my retainer agreements that I transact with my clients as a baseline rate. Andrew Guzzo is an associate at my firm whom I supervise and work with. Andrew billed at \$200.00 per hour in 2012 and his rate was increased to \$225.00

an hour in 2013. Our hourly fee clients pay these rates if they were to hire us on a non-contingent/fee shifting basis.

11. Generally, if a task does not take more than .1 (or six minutes), Mr. Guzzo and myself will not bill for that task. This includes reviewing PACER ECFs, fielding brief telephone calls, responding to quick emails, etc.

12. As of April 24, 2013, Surovell Isaacs Petersen & Levy, PLC had spent 36.80 hours on this matter. This resulted in total attorneys' fees expended of \$8,762.50.

13. I am familiar with the fees charged for attorneys with my experience and expertise and believe the rates of my law firm are in line with the prevailing market rates in Virginia.

14. The costs advanced and time expended does not include time spent drafting the Motion for an Award Attorneys Fees and Costs or any work done after April 24, 2013.

I declare under penalty of perjury of the laws of the United States that the foregoing is correct.

Signed this 25th day of April 2013.



Kristi C. Kelly

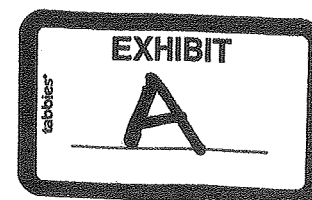
Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours Worked	Amount	
Client ID 49426.001 Redditt/Kay								
49426.001	12/13/2012	SMH	P	1	125	1.60	200.00	Draft consent motion for enlargement of time and proposed order; email to Ms. Kelly; review 12b6 motion. FedEx order to counsel; e-file consent motion.

Subtotal for Timekeeper SMH	Billable	1.60	200.00	Sharell M. Houston
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49426.001	09/18/2012	AJG	P	23	200	2.50	500.00	Prepare draft complaint.
49426.001	12/20/2012	AJG	P	1	200	2.60	520.00	Prepare draft opposition to MTD.
49426.001	12/26/2012	AJG	P	23	200	4.20	840.00	Prepare draft opposition to MTD.
49426.001	01/03/2013	AJG	P	4	200	0.40	80.00	Review of Ms. Kelly's edits to brief; update and edit brief.
49426.001	01/04/2013	AJG	P	26	225	3.20	720.00	Prepare draft opposition to MTD.
49426.001	01/07/2013	AJG	P	23	225	0.70	157.50	Prepare draft opposition to MTD.
49426.001	01/09/2013	AJG	P	25	225	4.40	990.00	Proof & edit MTD; legal research [REDACTED]; legal research [REDACTED]
49426.001	01/10/2013	AJG	P	25	225	2.60	585.00	Proof & edit and finalize MTD.
49426.001	02/06/2013	AJG	P	4	225	1.50	337.50	Review of reply brief; legal research on [REDACTED]
49426.001	02/14/2013	AJG	P	1	225	0.30	67.50	Telephone conference with Ms. Mason
49426.001	03/15/2013	AJG	P	1	225	0.70	157.50	Conference with Mr. Bieramee, Ms. Callahan and Mr. Savage.
49426.001	04/18/2013	AJG	P	1	225	0.30	67.50	Prepare consent motion and order.

Subtotal for Timekeeper AJG	Billable	23.40	5,022.50	Andrew J. Guzzo
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49426.001	02/01/2012	KCK	P	1	300	0.30	90.00	Correspondences with Mr. Redditt; Telephone conference with [REDACTED]
49426.001	09/18/2012	KCK	P	1	300	0.90	270.00	Edit complaint; Correspondences with Ms. Redditt.
49426.001	12/04/2012	KCK	P	1	300	0.30	90.00	Review 12b6.
49426.001	12/13/2012	KCK	P	1	300	0.80	240.00	Review 12b6; Correspondence with co-counsel; Correspondence to opposing counsel; Edit consent order.
49426.001	12/27/2012	KCK	P	1	300	2.60	780.00	Legal research; Review and edit opposition; Telephone conference with Mr. Ostroff; Draft consent order and motion.
49426.001	01/09/2013	KCK	P	1	300	0.50	150.00	Review and edit opposition brief.
49426.001	01/14/2013	KCK	A	42			12.17	Federal Express Federal Express
49426.001	02/28/2013	KCK	P	1	300	0.20	60.00	Review OOJ; Correspondence with Mr. Bieramee regarding surrepley order.
49426.001	03/06/2013	KCK	P	1	300	0.70	210.00	Telephone conferences and correspondences with opposing counsel and co-counsel regarding settlements.
49426.001	03/11/2013	KCK	P	1	300	0.20	60.00	Draft and file OOJ.
49426.001	03/12/2013	KCK	P	1	300	2.40	720.00	Review [REDACTED]; Prepare for mediation meeting to discuss settlement; Correspondences with co-counsel and clients [REDACTED]
49426.001	03/15/2013	KCK	P	1	300	0.70	210.00	Conference with Mr. Bieramee, Ms. Callahan and Mr. Savage.
49426.001	04/02/2013	KCK	P	1	300	0.50	150.00	Telephone conference and correspondences with counsel for Shaprio; Correspondences with co-counsel; Review deadlines and fee transactions for fee petitions.



Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours Worked	Amount	
49426.001	04/03/2013	KCK	P	1	300	0.30	90.00	Draft Order and Motion; Correspondence with Mr. Lynch and Mr. Ostroff.
49426.001	04/23/2013	KCK	P	1	300	1.40	420.00	[REDACTED]; Telephone conference with Mr. Ostroff; Attend conference call with Mr. Lynch and Mr. Ostroff.

Subtotal for Timekeeper KCK Billable 11.80 3,552.17 Kristi Cahoon Kelly

Total for Client ID 49426.001 Billable 36.80 8,774.67 Redditt/Kay
v. Shapiro & Burson, LLP

GRAND TOTALS

Billable 36.80 8,774.67